

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK**

SOLAX ENERGIA ALTIPLANO S.A. DE.
C.V. AND SOLAX ENERGY LLC,

Plaintiffs,

v.

ITHUBA CREDIT CORPORATION;
ITHUBA SAVINGS AND CREDIT;
ITHUBA INVESTMENT BANK AND
STATUTORY TRUST; ITHUBA
BUSINESS ADVISORY SERVICES, INC.;
ITHUBA HOLDINGS, INC.; ISCC GROUP
OF COMPANIES, JEAN BILALA AND
SEFUDI PAUL MALEKA,

Defendants.

**NOTICE OF MOTION FOR LEAVE
TO FILE UNDER SEAL**

Civil Action No.: 1:21-cv-00863-GBD-VF

PLEASE TAKE NOTICE THAT, upon the annexed Memorandum of Law, and all prior pleadings and proceedings had herein, Plaintiffs Solax Energia Altiplano S.A. DE. C.V. (“Solax S.A.”) and Solax Energy LLC (Solax LLC” and collectively with Solax S.A., “Solax” or “Plaintiffs”) hereby move this Court for an order pursuant to the Federal Rule of Civil Procedure 5.2 and 26(c), along with Section I(g) of Judge Figueredo’s Individual Practices (Civil) for leave to file under seal certain exhibits to the Declaration of Javier Sanchez Palau, Declaration of Jana Slavina Farmer, and Declaration of Expert Francisco Jose Minondo Amezcua in support of the Plaintiffs’ submissions for the Inquest into Damages.

Dated: June 20, 2025

Respectfully submitted,

/s/ Jana Slavina Farmer

Jana Slavina Farmer, Esq.
Wilson Elser Moskowitz Edelman & Dicker LLP
1133 Westchester Ave.

MEMO ENDORSED



HON. VALERIE FIGUEREDO
UNITED STATES MAGISTRATE JUDGE

Dated: 6/23/25

Solax is directed to file proposed redactions to the sealed exhibits by July 15, 2025.

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*Attorneys for Plaintiff Solax Energia Altiplano S.A. DE
C.V. and Solax Energy LLC*

CERTIFICATE OF SERVICE

I hereby certify that true and correct copies of the foregoing:

1. Notice of Motion for Leave to File Under Seal;
2. Plaintiffs' Motion to File Documents Under Seal;
3. Plaintiffs' Memorandum of Law in Support of Motion to File Documents Under Seal;
4. [Proposed] Order Granting Plaintiffs Application to File Documents Under Seal;
5. Plaintiffs' Proposed Findings of Fact and Conclusions of Law Concerning Damages;
6. Plaintiffs' Memorandum of Law in Support of Plaintiffs' Request to Recover Damages;
7. Declaration of Javier Sanchez Palau in Support of Plaintiffs' Submission for Inquest for Damages, with Exhibits 1-30;
8. Declaration of Expert Francisco Jose Minondo Amezcua in Support of Plaintiffs' Submission For Inquest Into Damages In This Matter, with Exhibits A and B; and
9. Declaration of Jana Slavina Farmer, with Exhibits A-F;

were e-mailed and mailed via US Mail to the last known business address upon the following entities on June 20, 2025:

Ithuba Credit Corporation
c/o Ohio Secretary of State
Attn: Paralegal Division - Service of Process
22 North Fourth Street, 16th Floor
Columbus, OH 43215

Ithuba Savings and Credit
8 Wolhuter Street
Bellville, Western Cape, 7530
South Africa

Ithuba Investment Bank and Statutory Trust
c/o CT Corporation System
Registered Agent
67 Burnside Ave.
East Hartford, CT 06108

Ithuba Business Advisory Services, Inc.
c/o Ohio Secretary of State
Attn: Paralegal Division - Service of Process
22 North Fourth Street, 16th Street
Columbus, OH 43215

Ithuba Holdings, Inc.
c/o Ohio Secretary of State
Attn: Paralegal Division - Service of Process
22 North Fourth Street, 16th Floor
Columbus, OH 43215

ISCC GROUP OF COMPANIES
8 Wolhuter Street
Bellville, Western Cape, 7530
South Africa

JEAN BILALA
Chairman and/or Chief Executive Officer of each of the Ithuba Defendants

BY: /s/ Jana Slavina Farmer
Jana Slavina Farmer